

Travis England

From: Claudia Wilner
Sent: Wednesday, June 5, 2019 1:56 PM
To: Quinn, Robert E
Cc: Darius Charney; Travis England
Subject: BLRR v City of Buffalo - ESI Search Terms and Custodians
Attachments: First 20 Custodians & Search Terms.docx; Relativity - Searching Guide - 9.6.pdf

Rob, in accordance with the court's instructions at the May 30 conference, attached are Plaintiffs' designations of 20 custodians and 20 search terms for the first search of ESI. Search strings were designed according to the instructions and definitions in the attached Relativity manual.

We will email you separately regarding searches of the 311 and IA Pro Databases.



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First Search of ESI – 20 Custodians and 20 Search Terms

A. CUSTODIANS

Named Defendants

1. Byron B. Brown
2. Byron C. Lockwood
3. Daniel Derenda
4. Aaron Young
5. Kevin Brinkworth
6. Philip Serafini
7. Robbin Thomas

BPD Personnel

8. Jeff Rinaldo
9. Unnamed Captain overseeing Buffalo Police Academy (referenced in Defs' Second Supplemental Response to Interrogatory No. 8 (Apr. 11, 2019))
10. Capt. Patrick Mann (BPD Training Officer)

BTVA Personnel

11. Kevin Helfer (Executive Director)
12. Danielle Morgera (Administrator)

Housing and Strike Force

13. Lt. Lance R. Russo
14. Lt. David Wilcox
15. Lt. George McLean
16. Lt. Thomas Whelan
17. Lt. Daniel Burke
18. Lt. Michael Quinn
19. Lt. Brian Strobel
20. Capt. Patrick Roberts

B. SEARCH TERMS

1. checkpoint~ OR check-point~ OR check w/2 point~
2. roadblock~ OR (road w/2 (block~ OR check~))
3. (vehicle~ OR traffic OR safety) w/2 (check~)
4. safety AND (Traffic OR roadway OR highway OR vehicle)
5. (tint~) w/4 (illegal~ OR window~)
6. traffic AND (study OR calming OR data OR number~)
7. Zero w/4 tolerance
8. (Secondary OR additional) w/4 (stop~ OR interrog* OR search~)

9. (ticket~ OR violation~ OR tow~ OR impound~ OR citation~) AND (BTVA OR VTL or 479 OR fine~ OR tally OR number OR revenue~ OR fees OR cost OR money OR proceeds OR profit~ OR quota~ OR data OR amount~ OR number OR total OR debt OR enforce* schedule~ OR list)
10. (Revenue~ OR fine~ OR fee~) AND (new OR City OR Buffalo OR revise~ OR collect~ OR generate~ OR earn~ OR total~ OR amount OR owe~ OR assess~ OR fund* OR data OR target)
11. (Budget~ OR fund~ OR revenue~ OR finance*) AND (traffic OR BPD OR BTVA OR HU OR "Traffic Violations Agency" OR "strike force" OR "housing unit" OR "SF" OR police OR officer~ OR "Law Department" OR government OR parking OR enforce* OR federal OR legal OR City OR Buffalo OR municipal~)
12. (Train* OR in-service) AND (traffic OR stop~ OR VTL OR Fourth OR 4th OR Fourteenth OR 14th OR "civil rights" OR bias OR discriminat* OR roadblock)
13. Complain~ AND (driving OR parking OR vehicle~ OR search~ OR stop~ OR seize~ OR seizure OR impound~ OR ticket~ OR fee~ OR arrest~ OR fine~)
14. (race OR racial OR ethnic* OR black OR latin* OR hispanic~ OR mexican~) AND (profil* OR bias~ OR disparit* OR discriminat*)
15. quota~
16. civil /2 right~
17. (Policy OR procedure~ OR policies OR directive~ OR bulletin~ OR order~ OR update~ OR decision~) AND (traffic OR stop~ OR ticket~ OR check-point~ OR checkpoint~ OR vehicle~ OR auto~ OR motor OR search~ OR zero OR hotspot~ OR hot-spot~ OR roadblock~)
18. (Change~ OR modif* OR amend~ OR levy~ OR assess~ OR impose~ OR revise~) w/6 (traffic OR fine~ OR fee~ OR "BTVA" OR "Buffalo Traffic Violations Agency" OR July OR 2013 OR "Chapter 175" OR "175")
19. (BPD OR police OR officer~ OR ticket~) w/6 (goal~ OR quota~ OR number~ OR "Citi-stat" OR "citistat" OR "city-stat" OR "citystat")
20. ("Attorney General" or AG) AND (investigat* OR report~ OR contact~ OR complain~ OR sue~ OR record~ OR request~)